

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, *et al.*,

Defendants.

Criminal Action No. 23-490 (SHS)

Document Electronically Filed

**NOTICE OF MOTION FOR NEW
TRIAL**

PLEASE TAKE NOTICE that Defendant Wael Hana hereby moves before the Honorable Sidney H. Stein, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for the entry of an order vacating the jury verdict and ordering a new trial.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant Mr. Hana shall rely upon the accompanying Brief Addressed to Evidence Improperly Provided to the Jury and in Support of Motion for A New Trial, Declaration of Lawrence S. Lustberg, with exhibits appended thereto, and Declaration of Wael Hana.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Mr. Hana also joins in all applicable motions filed by his co-defendants.

Dated: November 27, 2024

Respectfully submitted,

s/ Lawrence S. Lustberg
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